



Complaint for Failure to State a Claim, and (ii) the Declaration of Richard C. Pepperman II, dated December 15, 2020, and the exhibits thereto, the undersigned Defendants will move this Court, before the Honorable Lewis J. Liman, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 15C, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order dismissing the Amended Consolidated Class Action Complaint in its entirety with prejudice for failure to state a claim upon which relief can be granted under Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court may deem just and proper.

Dated: December 15, 2020  
New York, New York

Respectfully submitted,

/s/ Adam S. Hakki

Adam S. Hakki  
Richard F. Schwed  
SHEARMAN & STERLING LLP  
599 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 848-4000  
Facsimile: (212) 848-7179  
adam.hakki@shearman.com  
rschwed@shearman.com

*Attorneys for Defendants Bank of America  
Corporation; BofA Securities, Inc.; and  
Merrill Lynch, Pierce, Fenner & Smith  
Incorporated*

/s/ Jay Kasner

Jay Kasner  
Karen M. Lent  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
One Manhattan West  
New York, New York 10001  
Telephone: (212) 735-3276  
Facsimile: (917) 777-3276  
jay.kasner@skadden.com  
karen.lent@skadden.com

*Attorneys for Defendants Citigroup Inc. and  
Citigroup Global Markets Inc.*

/s/ Barry G. Sher

Barry G. Sher  
Anthony Antonelli  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6085  
Facsimile: (212) 230-5185  
barrysher@paulhastings.com  
anthonyantonelli@paulhastings.com

*Attorneys for Defendant Barclays Capital Inc.*

/s/ Herbert S. Washer

Herbert S. Washer  
Sheila C. Ramesh  
Tara H. Curtin  
CAHILL GORDON & REINDEL LLP  
32 Old Slip  
New York, New York 10005  
Telephone: (212) 701-3000  
hwasher@cahill.com  
sramesh@cahill.com  
tcurtin@cahill.com

*Attorneys for Defendant Credit Suisse  
Securities (USA) LLC*

/s/ John Terzaken

John Terzaken  
Adrienne V. Baxley  
Lani Lear  
SIMPSON THACHER & BARTLETT LLP  
900 G Street, NW  
Washington, DC 20001  
Telephone: (202) 636-5000  
Facsimile: (202) 636-5502  
john.terzaken@stblaw.com  
adrienne.baxley@stblaw.com  
lani.lear@stblaw.com

Susannah S. Geltman  
SIMPSON THACHER & BARTLETT LLP  
425 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 455-2762  
Facsimile: (212) 455-2502  
sgeltman@stblaw.com

*Attorneys for Defendant Deutsche Bank  
Securities Inc.*

/s/ Robert D. Wick

Robert D. Wick  
John S. Playforth  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, N.W.  
Washington D.C. 20001  
Telephone: (202) 662-6000  
Facsimile: (202) 662-6291  
rwick@cov.com  
jplayforth@cov.com

*Attorneys for Defendants JPMorgan Chase &  
Co. and J.P. Morgan Securities LLC*

/s/ Richard C. Pepperman II

Richard C. Pepperman II  
Matthew J. Porpora  
Jonathan S. Carter  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004-2498  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
peppermanr@sullcrom.com  
porporam@sullcrom.com  
carterjo@sullcrom.com

*Attorneys for Defendants The Goldman Sachs  
Group, Inc. and Goldman Sachs & Co. LLC*

/s/ Richard A. Rosen

Richard A. Rosen  
Susanna Michele Buergerl  
Brad S. Karp  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON, LLP  
1285 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 373-3305  
Facsimile: (212) 492-0305  
rrosen@paulweiss.com  
sbuergerl@paulweiss.com  
bkarp@paulweiss.com

Jane Baek O'Brien  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON, LLP  
2001 K Street, N.W.  
Washington, D.C. 20006  
Telephone: (202) 223-7300  
Facsimile: (202) 223-7420  
jobrien@paulweiss.com

*Attorneys for Defendant Morgan Stanley;  
Morgan Stanley & Co., LLC; and Morgan  
Stanley Smith Barney LLC*

/s/ Paul S. Mishkin  
\_\_\_\_\_  
Paul S. Mishkin  
Adam G. Mehes  
John M. Briggs  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4292  
paul.mishkin@davispolk.com  
adam.mehes@davispolk.com  
john.briggs@davispolk.com

*Attorneys for Defendant NatWest Markets  
Securities Inc.*

/s/ Jayant W. Tambe  
\_\_\_\_\_  
Jayant W. Tambe  
Laura W. Sawyer  
JONES DAY  
250 Vesey Avenue  
New York, New York 10281  
Telephone: (212) 326-3604  
jtambe@jonesday.com  
lwsawyer@jonesday.com

*Attorneys for Defendants Wells Fargo & Co.;  
Wells Fargo Securities LLC; and Wells Fargo  
Clearing Services LLC*